



U.S. Department of Justice
Consumer Protection Branch

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VIA FEDEX

Jonathan D. Gershon
Larson LLP
555 South Flower Street
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Los Angeles, CA 90071

Re: *United States v. Jason Edward Thomas Cardiff*,
5:23-cr-00021-BERNAL (C.D. Cal)

Dear Counsel:

Enclosed please find the government's first discovery production in the above-captioned matter. The enclosed production is provided on a hard drive. The password to access the drive will be emailed to you separately. As discussed, there are more than seven million documents in the government's possession, and we are working to produce all relevant materials as expeditiously as possible. However, it is worth noting that the defendant may already be in possession of a significant number of these documents.

The first production contains approximately 118,600 documents. Within this first production, we have produced 152 "notable documents" – that is to say, certain documents that the government would likely rely upon in its case in chief at trial. We are also producing agent-generated materials, grand jury subpoena returns, search warrant materials, and documents received from Redwood's former customer relationship management (CRM) system, Sticky.io f/k/a Limelight. For your convenience, the documents in Production 1 are produced both in load-ready format, as searchable PDFs, and in some cases, in native format. Pursuant to the stipulated protective agreement regarding the proposed protective order, the government is identifying all of these documents as CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER. In addition, per our communications, in the interest of cooperation, we are providing these documents prior to the Court entering the protective order with the understanding that these documents will be treated as if the protective order were already in place.

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Below, please find an overview of the documents contained in Production 1:

- “Notable Documents.” Documents that the Government will likely rely upon in its case in chief. The majority of these documents come from the FTC’s Lighthouse database, and a small number come from the Receiver’s Google Drive production and the Sticky.io production.
- Agent-Generated Materials. This production contains the memoranda of interviews (MOIs), Memoranda to File (MTFs), and Memoranda of Activity (MOA) generated during the investigation of this matter. The Bates prefix for this set of materials begins with “GOV_MOI.” These 64 documents are not in load-ready format but are in pdf format.
- Subpoena Returns. Grand Jury subpoena returns produced during the course of the Government’s investigation. The subpoena returns contain bank information related to your client and his business operations, payment processor data and correspondence, and information related to the operation of Redwood Scientific Technologies, Inc.
- Sticky.io (f/k/a Limelight) information. Sticky.io was Redwood’s customer relationship management (CRM) system software throughout the period in question.
- Google search warrant return. Information from Jason Cardiff’s YouTube account.
- An imaged copy of Danielle Walker’s (a/k/a Danielle Cadiz) Redwood laptop.

An index detailing the bates stamp ranges for each document set will be attached to this letter.

Please note that the Government also maintains a copy of the docket in the FTC’s civil case against your client, *FTC v. Jason Cardiff*, 18-cv-02104-DMG. As this docket involves your client and is also available to the public, we will not include it in our discovery productions. However, if you would like us to provide you with a copy of the docket, please let us know.

To the extent that the enclosed materials and any future discovery provided to you exceeds the scope of discovery mandated by the Federal Rules of Criminal Procedure, federal statute, or relevant case law, such materials are provided voluntarily and solely as a matter of discretion. By producing such materials to you, the government does not waive its right to object to any future discovery requests beyond the ambit of its legal obligations.

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With this letter the government also requests all reciprocal discovery to which it is entitled under Rule 16(b) and 26.2 of the Federal Rules of Criminal Procedure. The government also requests pursuant to Rules 12.1, 12.2, and 12.3 all notice of intention of your clients to rely on an entrapment defense, a defense involving mental condition or duress, an alibi defense, or a public-authority defense.

Respectfully,

A handwritten signature in black ink that reads "Manu J. Sebastian". The signature is written in a cursive style with a horizontal line underneath the name.

Manu J. Sebastian
Trial Attorney

Production 1 Index

BEG BATES	END BATES	DESCRIPTION
GOV MOI 000001	GOV MOI 001076	Agent Materials (USPIS MOIs, MTFs, etc.)
GOV001_00000001	GOV001_00000335	Notable Documents (Lighthouse and Receiver)
GOV001_00025445	GOV001_00025452	Notable Documents (Sticky.io production)
GOV001_00025919	GOV001_00025924	Notable Documents (Sticky.io production)
GOV001_00000336	GOV001_00000753	Sticky.io (f/k/a Limelight) Documents
GOV001_00000754	GOV001_00001875	Discover (Subpoena Return)
GOV001_00001876	GOV001_00001977	First City Credit Union (Subpoena Return)
GOV001_00001978	GOV001_00002046	East-West Bank (Subpoena Return)
GOV001_00002047	GOV001_00002226	Bank of America (Subpoena Return)
GOV001_00002227	GOV001_00010271	Clear Trust (Subpoena Return)
GOV001_00010272	GOV001_00010272	Coin Base (Subpoena Return)
GOV001_00010273	GOV001_00010771	TD Ameritrade (Subpoena Return)
GOV001_00010772	GOV001_00011060	Meadows Bank (Subpoena Return)
GOV001_00011061	GOV001_00012651	JP Morgan Chase (Subpoena Return)
GOV001_00012652	GOV001_00013691	Payday Workforce Solutions (Subpoena Return)
GOV001_00013692	GOV001_00013722	Vantiv (FIS) (Subpoena Return)
GOV001_00013723	GOV001_00014340	Paychex (Subpoena Return)
GOV001_00014341	GOV001_00021171	American Express (Subpoena Return)
GOV001_00021172	GOV001_00021935	Answering Specialists (Subpoena Return)
GOV001_00021936	GOV001_00021938	FreeVoice (Subpoena Return)
GOV001_00021939	GOV001_00022492	UPIC Insurance Services (Subpoena Return)
GOV001_00022493	GOV001_00022618	Sticky.io (f/k/a Limelight) Documents
GOV001_00022619	GOV001_00025282	Answer Connect (Subpoena Return)
GOV001_00025283	GOV001_00026148	Sticky.io (f/k/a Limelight) Documents
GOV001_00026149	GOV001_00027218	Answer Connect (Subpoena Return)
GOV001_00027219	GOV001_00029792	EMC2 Billing (Subpoena Return)
GOV001_00029793	GOV001_00029884	Google (Subpoena Return)
GOV001_00029885	GOV001_00029927	Stamps.com (Subpoena Return)
GOV001_00029928	GOV001_00030109	JP Morgan Chase (Subpoena Return)
GOV001_00030110	GOV001_00030182	Google Search Warrant Return
GOV001_00030183	GOV001_00030683	Sticky.io (f/k/a Limelight) Documents
GOV001_00030684	GOV001_00031187	Grand Valley (Subpoena Return)
GOV001_00031188	GOV001_00275824	Danielle Walker (a/k/a Danielle Cadiz) Laptop
GOV001_00275825	GOV001_00275971	Chino Commercial Bank (Subpoena Return)
GOV001_00275972	GOV001_00276413	Mountain Grove Office Park (Subpoena Return)
GOV001_00276414	GOV001_00276655	Elavon (Subpoena Return)
GOV001_00276656	GOV001_00276747	JP Morgan Chase (Subpoena Return)